REMARKS

Claims 1-19 are pending. Reexamination and reconsideration of the application in view of the present remarks are respectfully requested.

Claims 1-19 were rejected under 35 U.S.C. 102(e) as being anticipated by Anderson et al (US 7,046,789). The Examiner stated:

"As per claim 1, Anderson et al discloses: a first storing step of storing, by a management terminal that manages said representatives, representative information indicating a plurality of representatives who are in charge of an organization that a user belongs to, (Col. 18, lines 9-15, establishing call center resource data corresponding to a plurality of different resources where resources are analogous to representatives, w/ col. 18, lines 48-51, shows resource category includes individual agents. In this case, storing is inherent since a the system is computer-implemented, and information must be stored on a computer in order for it to be processed), and selection information indicating a selected representative who is selected from a plurality of representatives by the user, (Col. 18, lines 34-36, receiving selections of selected statistic display options corresponding to resource categories); a screen generating step of generating, by said management terminal, data of a first screen which indicates the selected representative that the selection information indicates, (Col. 18, lines 37-40, obtaining as a result of selected display options), where it is possible for the user to select on the screen, another representative than said selected representative, from said plurality of representatives that the representative information indicates, (Col. 17, lines 39-42, multiple statistics or screens can be opened simultaneously); a screen sending step of sending, by said management terminal, data of said first screen to a user terminal operated by the user; and a displaying step of displaying, by said user terminal, the first screen by using the provided data of the first screen, (Col. 18, lines 41-43, displaying)."

This rejection is respectfully traversed.

Claims 1-19 are directed to methods and systems for managing representatives in an e-commerce system. In representative claim 1, for example, the claimed method comprises several elements in combination. A management terminal stores both information regarding representatives in an organization to which a user belongs and selection information indicating a representative selected by the user. The management terminal generates screen data indicating the selected representative. The management terminal sends the screen data to the user's terminal, and the user's terminal displays the screen data. Significantly, it is possible for the user to select, on the

screen, another representative (other than the selected representative) from among the plurality of representatives indicated by the representative information. The user is thereby free to select a representative other than, or in addition to, the initially selected representative.

An example of one such embodiment is shown in Figure 8 of the present application. As shown in FIG. 8, an introduction screen shows information concerning each salesperson of a company to which a user belongs. The image, name, department, etc., of the salesperson selected by the user are displayed. A pull down menu is provided to enable the user to select another salesperson. The selected salesperson serves as the contact person for the user. See paragraphs 0075-0077.

A similar combination is neither disclosed nor suggested in Anderson. Anderson merely discloses a technique relating to a call center management system. Anderson fails to disclose or suggest a combination including "reading representative information indicating representatives who are in charge of an organization that a user belongs to, generating data of an image which displays the information indicating the plurality of representatives who are in charge of the organization that the user belongs to, where it is possible for the user to select a representative, and sending the data to a user terminal".

The present claims require "representatives who are in charge of an organization that a user belongs to." Anderson fails to teach or suggest a combination including this feature. Anderson's disclosure of "resources" does not teach or suggest "representatives who are in charge of an organization that a user belongs to."

A proper rejection under §102 requires that each element of the claimed invention must be disclosed in the cited reference identically. It is inadequate if the reference merely discloses a claimed feature by analogy. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)(emphasis added); See MPEP §2131. Therefore, even if one considers the

"resources" disclosed in Anderson as being analogous to the "representatives" required by the current claims, Anderson fails to anticipate the claimed invention.

Moreover, even if one considers the "resources" disclosed in Anderson as being <u>identical</u> to the "representatives" required by the current claims, there is still no teaching or suggestion in Anderson of a combination wherein it is possible for the user to select, on the screen, another representative (other than the selected representative) from among the plurality of representatives indicated by the representative information. There is no teaching or suggestion in Anderson of a combination wherein the user is free to select a representative other than, or in addition to, the initially selected representative. Anderson therefore fails to disclose or suggest the combination of elements defined by claims 1-19.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 116692004800.

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